

## MEMO ENDORSED



## ABRAMS GARFINKEL MARGOLIS BERGSON, LLP

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May 1, 2020

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
 United States District Judge  
 Thurgood Marshall  
 United States Courthouse  
 40 Foley Square  
 New York, NY 10007

Re: *Kiran Vuppala v. Caserta Eye, Inc., et al.*  
Case Number: 20-cv-01571-ALC

Dear Judge Carter:

We have just been retained to represent defendant 67 8<sup>th</sup> Ave. Owners Inc. (the "Co-op"), one of the defendants in the above-referenced ADA accessibility action. We filed our Notice of Appearance yesterday. The other defendant, Caserta Eye, Inc., is the retail tenant located at the Co-op (they have not yet entered an appearance, and have been shut down due to the COVID-19 national health crisis, but I have been in touch with their counsel). On March 16, 2020, counsel for the plaintiff, The Weitz Law Firm, P.A., filed a letter application (ECF Doc. No. 7) requesting that the Court grant a stay of all deadlines and/or conference in this matter. There is no reference in the docket that this application was addressed by the Court. The parties are desirous, and have already begun, discussing resolution/settlement of this matter, however, the current health crisis has created certain challenges, economic and otherwise, which may delay the ultimate resolution of this matter.

The undersigned wishes to join in plaintiff's counsel's request for a stay of these proceedings for another 30-60 days to allow the parties additional time to discuss resolution. If resolution is achieved, no response to the complaint would be necessary. If a stay is granted, the parties respectfully request that the time to

respond to the complaint, should that become necessary, be extended to a date sixty (60) days after the stay is lifted. If the Court is not prepared to stay this action, the undersigned, on behalf of all defendants, respectfully requests that the time for all defendants to respond to the complaint be extended to and including July 1, 2020 and that any conferences for this matter be scheduled for a date after July 1, 2020. Counsel for the plaintiff is aware of this application and has consented to the relief sought herein.

Respectfully submitted,

*Barry G. Margolis*

Barry G. Margolis

cc: All Counsel via ECF

SO ORDERED:  
*Andrew L. Carter Jr.*  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

6/3/20